



October 21, 2011

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**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 04-36**

Dear Ms. Dortch:

Today, Tom Tauke, Executive Vice President - Public Affairs, Policy and Communications, and the undersigned of Verizon met with Commissioner McDowell and Christine Kurth, Policy Director and Wireline Counsel for Commissioner McDowell. The purpose of the meeting was to discuss the draft universal service and intercarrier compensation reform order now circulating, as well as America's Broadband Connectivity Plan submitted by a coalition of companies including Verizon.

In particular, we discussed the jurisdiction of Voice over IP and broadband services, the interstate nature of these services, and how the draft order may address VoIP and broadband for intercarrier compensation purposes. In addition, we discussed the interconnection provisions of the Communications Act and parties' various positions with respect to IP interconnection. We reiterated Verizon's position that IP interconnection continue to be addressed through commercial agreements. We also discussed the need for the draft order to eliminate legacy "eligible telecommunications carrier" universal service obligations for voice services when the Commission eliminates high-cost support to particular carriers. We said that the Act requires the Commission to eliminate legacy obligations when carriers are not provided with funding to fulfill those obligations.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo".